

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

**MOTORS LIQUIDATION COMPANY, et al.,
f/k/a/ General Motors Corp., et al**

**Chapter 11 Case No.
09-50026**

DEBTORS

(Jointly Administered)

**RESPONSE AND OBJECTION TO DEBTOR'S EIGHTY-THIRD OMNIBUS
OBJECTIONS TO CLAIMS**

**NOW COMES CLAIMANT, LINDA K BELLAIRE, CLAIM NUMBER 62922, and
hereby Objects to the Eighty-Third Omnibus Objection to Claims for the
following reasons:**

- 1. That the Debtor's Objection is based on the allegation that "the Debtors are not liable" to pay and satisfy your Claimant's claim.**
- 2. That said allegation is incorrect.**
- 3. That the subject claim is for continuation of an earned and accrued benefit, to wit: the continuing lifetime coverage and the future payment at the time of your Claimant's death of Continuing Life Insurance benefits in the amount of \$241,020.00 pursuant to the Debtor's Life and Disability Program.**
- 4. That said benefits were earned by your Claimant based upon her thirty-five (35) years of employment with Debtor as an Engineering Group Manager at the time of her retirement in 2008.**
- 5. That said earned and accrued benefit was acknowledged by Debtor in GM publication 3.GM-H-425G.104**
- 6. That a copy of said publication is available for review at claimants address: 1210 Lake Shore Blvd, Lake Orion, MI 48362**
- 7. That other members of my household filed similar claims using identical calculations and said claims were not singled out for denial. And therefore, given this fact, questions the reasoning for the decision to disallow all aspects of said claim by Linda K Bellaire.**

WHEREFORE, Claimant respectfully requests this Court Deny Debtor's Eighty-Third Omnibus Objections to Claims and allow Claimant's Claim as previously filed with the Court.

Respectfully submitted,



**Linda K Bellaire
Claimant, No. 62922**

August 30, 2010

ECC-GM-H-436A.100

Benefits and Compensation

**Per GM publication 3.GM-H-425G.104
Your Benefits in Retirement Summary Plan Description
A Handbook for Salaried Retirees in the United States**

"Any retirement benefits you may be eligible to receive as a retired GM employee or surviving spouse are based on the provisions of the GM Salaried Retirement Program in effect when you, or your deceased spouse, retired. However, the benefit amounts may have been increased from time to time, depending on the date you, or your deceased spouse, retired or died."

**"Disqualification, Ineligibility, Denial, Loss,
Forfeiture, Suspension, Offset, Reduction or
Recovery of Benefits**

The following circumstances may result in disqualification, ineligibility, denial, loss, offset, suspension, reduction or recovery of benefits. The circumstances include but are not limited to:

■ Insufficient credited service; Impartial Total & Permanent Disability Retirement Examinations; offsets due to Social Security, workers' compensation; failure to comply with program eligibility rules; gainful employment if receiving total and permanent disability related benefits; termination of the plan; tax levy; any benefit plan overpayments due to any reason."

Nowhere in the above does bankruptcy preclude denial or loss of these benefits in place at my retirement time.